

| Tuolumne County Draft Hangar Policy Comment Matrix | | | | | | |
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| ver: 0.1 ver date: 4/10/15 | | | | | | |
| Date Rcvd | Comment From | Section | Comment | Response | Policy Language Change | Clarification and/or Questions for AAC |
| 4/10/2015 | Gen Pub | Ownership III, A, 2 | Regarding LLC participation or Corporate ownership, the terms "equal" "pro rata share" and "minimum 20%" are somewhat contradictory, at least not "equal". At the previous AAC meeting County Counsel agreed in principal that the airport manager should not devise stipulations with intent to intrude in the affairs of the corporation or LLC. | This will be forwarded to County Counsel for review and change or clarification. | Requires Legal Review | |
| 4/10/2015 | Gen Pub | IV, A, 2 | This policy is somewhat intrusive, the next thing the airport manager will be asking is, "shouldn't that tire be replaced?" Stay out of the logbooks period. The requirement to prove the aircraft is airworthy is a simple matter of seeing the Airworthiness Certificate displayed in the aircraft per FARs. Even if the airport manager is an A&P Mechanic, the logbooks are private. What about an airplane under construction in which case it will probably be much longer than 12 months before an Airworthiness Certificate is issued by the FAA. | It is not the intention of the airport to inspect the logbooks at length or in specific detail, nor is it the airports purview to make maintenance decisions about individuals aircraft. Documentation accepted is a current airworthiness certificate and proof of a current passed annual inspection. | Language in the policy will be updated to clarify what will be expected in terms of documentation for the airworthiness of aircraft. | |
| 4/10/2015 | Gen Pub | Hangar fees for aircraft under construction IV, B, 1 | WHY should an aircraft under construction be required to pay double the normal hangar fee? Where is this precedent set? Lease rates for hangars of the same type should be equal, i.e.. flat rate. Could the airport manager demand the corporate box hangar tenant to double the assessment for a sublet tenant who is building an airplane? | Aircraft construction will not be allowed in hangars unless the hangar has been improved to allow for the construction of aircraft. Non-improved hangars will not be allowed to contain aircraft under construction. The primary lease is between the county and primary tenant. While subleases must be approved by the airport manager, all subleases are controlled by the primary tenant and not subject to the non-airworthy or aircraft under construction rate rules. All other rules will still apply to the subtenant. | Language added to section IV, B, 1 "All county owned hangars improved to allow for the construction of aircraft will be set at a rental rate as determined by the Board of Supervisors. The rate will be the regular county set rental rate plus the additional cost to the county for the maintenance and upkeep of the improvements." Language added to Section (corporate box hangar subleasing rules) "Subleases will not be subject to the non-airworthy or aircraft under construction rules. All other rules will still apply." | |
| 4/10/2015 | Gen Pub | Requirements for aircraft under construction IV, B, 2 | Aircraft builders rarely purchase an engine at the onset of the project. It is often one of the last components to be purchased or may be in the process of being assembled off site. This stipulation is not logical. | Since the primary goal of the airport with respect to hangars is to rent hangars to tenants who actively use the airport and its services, the intent is to limit the amount of time a hangar is used for the construction of an aircraft. When renting a hangar for the construction of an aircraft, the prospective tenant should have the majority of the aircraft and aircraft components purchased and ready for final assembly. As stated in other sections, aircraft construction can only take place in an improved hangar allowing for the construction of an aircraft. | Language added to section IV, B, 2 "Aircraft construction will not be allowed in any hangar that is not improved to allow for the construction of aircraft. Any hangar may be improved to allow for the construction of aircraft. Installation of improvements to allow construction in any hangar must be first approved by the airport manager. At a minimum, hangar improvements that may allow for the construction of aircraft will require the installation of fire rated walls, an extinguisher system, and proper storage of flammable materials. All improvements will be at the sole cost of the requesting Permittee." | |
| 4/10/2015 | Gen Pub | Double hangar fees for non-airworthy aircraft IV, C, 1 & 2 | Neither of these stipulations would be required if hangar fees are established as flat rates whether or not the Airworthiness Certificate has been issued by the FAA. This onerous policy makes the tenant jump through unnecessary hoops and lacks common sense. | The primary goal of this portion of the policy is to discourage use of the hangar for storage. For instances where a tenant is making ample progress or attempting to make ample progress and is unable to due to circumstances out of their control may appeal the double hangar rate for non-airworthy aircraft through Sections IV, C, 1 and 2. | No Change Recommended | |
| 4/10/2015 | Gen Pub | Ownership: D | It was decided at a previous AAC meeting that the airplane owner does not need to possess a pilot certificate in order to be a tenant. The draft does not reflect this agreement. This concept should also be stipulated in the section dealing with LLC or Corporate ownership. | The requirement of possessing a pilot certificate or being a student pilot to get onto the waiting list was discussed but not finalized. However, the point is well taken and the requirement is removed. | Language in the policy will be updated to reflect that any individual owning an aircraft may be placed on the waiting list and rent a hangar. | |

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| 4/10/2015 | Gen Pub | Unannounced access to hangar VI, 4 | Both the County and the Fire Marshall should not enter at any time, without prior notice for any reason (other than fire or emergency). This is a privacy issue and previously addressed by County Counsel. | In the event of an emergency the County may enter the premises without prior notification. The Fire Marshall may enter the premises at any time without prior notification. For any reason, the county may enter the premises provided prior notification is provided. However, language will be added that the tenant will be given the opportunity to be present when the premises is entered in any non-emergency situation. The privacy issue discussed by County Counsel was on who may attend an airport hangar inspection. These are private and may only be attended by the Airport Manager, their designee, airport maintenance, the Fire Marshall, and the current tenant. | Language to be clarified on who is allowed to be present at a hangar inspection. Language to be added giving the tenant the opportunity to be present at any non-emergency entrance of the premises. | |
| 4/10/2015 | Gen Pub | Updating Waiting Lists: J | Suggest the verbiage "same position" on the waiting list in lieu of "same point" on the list. | Agreed | Language to be changed to "same position" | |
| 4/10/2015 | Gen Pub | Sublease: M | "The primary permit holder may not assess a rate greater than the equal share of the number of sub lessees on the premises." At the first meeting to discuss this draft, Courtney Aviation made it clear, and there was a consensus, that it is not the airport manager's business to control sublet rental fees assessed by corporate "box" primary lease holders. | Individuals brought up the point and there was some agreement with the attendees of the AAC meeting that the airport manager should not be concerned with what is charged for sublets. However, this is directly in the purview of the airport management role as tenants charging more than the established rate for the hangar would be in violation of a few different rules and regulations. County counsel listed a few that could be caused to be violated through the subleasing a hangar for an amount over the established rental rate. Some of these include but are not limited to, running a business out of the hangar, running a business using county property, profiteering, gift of public funds, etc. | No Change Recommended | |
| 4/10/2015 | Gen Pub | Survivorship: P | At the first meeting is was agreed the non-pilot spouse could own the aircraft, remain the hangar tenant, and anyone could fly the aircraft for them. | Language requiring a pilots certificate or to be a student pilot has been removed. As such, a spouse may be added to a hangar permit, apply for a hangar permit with a spouse, be added to a waiting list to be placed on a hangar permit, etc. It will be up to the hangar tenant or spouse thereof to make sure they are added to the permit in order to retain possession of the premises. | No Change Recommended | |
| 4/10/2015 | Gen Pub | Indemnification V, E | The indemnification clause is very broad. This is what insurance is for. Perhaps County Counsel can explain in layman's terms how this concept applies to the hangar tenants and how they may liable for the costs described. | This is the standard county indemnification clause which applies to all county facilities, contracts, and/or permits. | No Change Recommended | |
| 4/10/2015 | Gen Pub | Storage of items in hangars VI, 3 C | Obviously flammable liquids, paints or materials should be properly contained. (where does the tenant store solvents and other agents?) The language in this draft indicates we are required to drain all the fuel in the airplanes each time we put them in the hangar. Previous hangar leases simply stipulated metal cabinets are required for storage of paints, solvents or other flammables. [Recall the days when Cal Fire under the direction of Kerry Hubbard(?) demanded the County should retrofit and install sprinkler systems in all of the hangars? Hopefully the AAC will push back on this issue.] | Will review all prior instances of reserve space permits to assess if permission was granted to store flammable liquids, paints, or other flammable materials. Fuel in aircraft are already stored in a safe manner by design. There is no requirement to drain aircraft of fuel. This policy must remain consistent with county ordinance. County ordinance specifically prohibits the storing of flammable liquids or materials in the hangars. Language in the policy could be updated to allow for the proper storage of these materials should county ordinance first be changed. | A change in current wording will create an inconsistency with county ordinance. | |

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| 4/10/2015 | Gen Pub | Hangar inspections VI, 4 | Previous discussion at the AAC meeting when this policy was first presented did not result in (only) 24 hours notice, which in many cases would be impossible for the tenant to be in compliance. Also discussed was that this section should stipulate the County will have at least two representatives present, and that the tenant may schedule this appointment so as to be in attendance at the time of inspection. | Procedures will be written about what can be expected in terms an annual inspection. | Language will be added that notification of annual inspections will be sent out via certified mail with a return receipt requested. The annual inspection will take place 24 hours from the date or receipt of the letter. | |
| 4/10/2015 | Gen Pub | General | Page 17 doesn't really make a lot of sense, or perhaps it is boilerplate pasted from other lease agreements. Hopefully County Counsel can also explain in layman's terms how this list of stipulations applies to current and future hangar tenants | The eight points listed on the last page are FAA rules for hangars at airports. These are used in the formulation of the hangar policy. However, they are indeed in the wrong section and should be removed. | List to be removed. | |
| 4/10/2015 | Gen Pub | Letter of Petition (signed by 20 individuals) | Upon reviewing the Draft it is our view that it should be amended and held out again for increased public input. Much of the language in the Draft regarding several important items and issues are ambiguous and or incomprehensible. Other items also appear to have contradictions or have conflicting statements. Other items also appear to have contradictions or have conflicting statements. Other specific items are completely incongruous and unnecessary for the type, size and essence of a small community Airport. We suggest an open public meeting be arranged for persons to attend who may or will be affected by any new rules spelled out in this Draft. The meeting should be held at an hour and day of the week when most persons will be able to attend. The date selected should be published and disseminated well in advance to assure as many people as possible who have interests at the Airports have the opportunity to express their opinions and concerns regarding all items featured in the Draft. We request the above suggestion for greater public input be implemented and accomplished before any other amendments to the Draft or any other actions be taken by the County Airport Manager or the Tuolumne County Board of Supervisors. | The draft hangar policy can be commented on at any point in time. There will be more than one draft of the policy and each draft can be commented on prior to, during, and after an AAC meeting. A final opportunity to comment on the draft hangar policy will be when it is presented to the Board of Supervisors for approval. The process described is the process being followed. All AAC meetings where the draft hangar policy is being discussed is announced online and posted at the airport lobby. Members of the general public and airport users are encouraged to participate in these regularly scheduled meetings which occur every second Monday of each month at 6PM at Columbia Elementary School. | N/A | Would the AAC like to suspend the hangar policy formulation and form a public workshop on the hangar policy? |
| 4/9/2015 | Gen Pub | Paragraph N | Stating that FBOs and Concessionaires cannot store aircraft that are in their business name and are in support of their business in Paragraph N, “Airport Fixed Based Operators and Concessionaires” is absolutely ridiculous. Where did this come from? I have researched this matter and I can see that the FAA has issued a policy statement reinforcing its stance that hangars on airports that receive federal funds must be used for “aeronautical purposes” but I can’t find anywhere that the FAA says they have to be used for “strict personal use only”. Leaving my airplane outside would make it vulnerable to theft, vandalism and the deteriorating effects of weather – why do I not have the same right to security just because I am a FBO and my airplane is in the name of my business? | This section will be updated to remove this portion as a lot of owners personal arcraft are in the business name. | Policy recommended to be updated to remove this restriction. | |
| 4/9/2015 | Gen Pub | Section III | Section III, “Aircraft Ownership Documentation Requirements”, allows the storage of an airplane registered to a corporation and does not require that the airplane be “for strict personal use only” – meaning a non-FBO corporation could store their airplane in a hangar and use it for their business and I cannot because I am a FBO! | This section will be updated to remove this portion as a lot of owners personal arcraft are in the business name. | Policy recommended to be updated to remove this restriction. | |
| 3/11/2015 | Gen Pub | | I do not believe that this proposed policy should be advanced at this time. The reasons are numerous. | No response | No response | Would the AAC like to suspend the hangar policy formulation and form a public workshop on the hangar policy? |

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| 3/5/2015 | Gen Pub | General | I believe that the county is too strict on what items can be stored in a hanger. Let me back that up by saying I strongly believe that there has to be an aircraft stored in any hangar leased by the county. I also believe that there should not be hazardous materials, etc. stored in the hangar. However I do believe that beyond those two criteria it shouldn't matter to the county what is in the hangar. If a renter has room for 2 or 3 cars or any other personal items along with his aircraft then so be it. Certainly this would be reasonable in the corporate box hangars. | FAA regulations and guidance prohibit the storage of any items the inhibit access to the aircraft. Fire code prohibits the storage of any item in the hangar that prohibits unimpeded access into the premises in the event of a fire. County Ordinance specifically states what is allowed and not allowed for storage in a hangar. This policy cannot be written inconsistently with any of these sources. Should county ordinance be changed then this hangar policy would also receive the change. | No recommendation at this time. | |
| 3/4/2015 | Gen Pub | General | My main concern is with hangar rental rates as they apply to Non-airworthy and aircraft under construction. I understand the intent regarding non-airworthy aircraft but aircraft under construction should not have their rent doubled. The main reason to build your own aircraft is due to the high cost of certified aircraft so doubling their rent during construction could be a major hardship. I took 6 years to build my experimental aircraft so the hangar cost would have been significant. If you are trying to eliminate aircraft construction in your hangars then this policy as written will do just that. | Currently the FAA does not have a policy allowing for construction of aircraft in publically owned hangars. New rulemaking seems to suggest that this will be allowed soon. However, as stated in other sections, the language has been modified. | Language in the hangar policy has been changed to read "Aircraft construction will not be allowed in any hangar that is not improved to allow for the construction of aircraft. Any hangar may be improved to allow for the construction of aircraft. Installation of improvements to allow construction in any hangar must be first approved by the airport manager. At a minimum, hangar improvements that may allow for the construction of aircraft will require the installation of fire rated walls, an extinguisher system, and proper storage of flammable materials. All improvements will be at the sole cost of the requesting Permittee," as it pertains to aircraft under construction. | |
| 3/4/2015 | Gen Pub | General | One possible idea might be to increase the rental rate 10% for each year that the aircraft under construction has not been completed, not to exceed a doubling of the rate? | This is an interesting idea and could be considered. However, the current approach is to only allow aircraft construction in a hangar improved to allow for construction of aircraft. The rental rate proposed for aircraft under construction in improved hangars is the regular rate plus costs to repair and maintain the improvements which may be more reasonable than increasing the amount each year above the CPI rate. | N/A | |
| 3/4/2015 | Gen Pub | General | Please reconsider the aircraft under construction rental rates as written. | These rates were reconsidered and updated as stated in previous sections. | N/A | |
| 3/3/2015 | Gen Pub | General | I am concerned over your wanting to charge a renter double if your airplane is temporarily non-airworthy for some reason. We are renting a fixed space. We pay taxes on that space every year. If I have to wait a month for a part to complete my annual you want me to pay double! Not fair at all....I think you will get a lot of flack on this one. | Section IV, C, 1 and 2 allow for extensions for extenuating circumstances. | No Change Recommended | |
| 3/3/2015 | Gen Pub | General | The New Policy Looks Good but enforcement is going to be an issue. | Thank You | N/A | |
| 3/3/2015 | Gen Pub | General | Looks like you have done the best that you can with the wording of this revised policy. Hope that it helps with the issues that you face | Thank You | N/A | |
| 4/10/2015 | Gen Pub | B | Need to make sure that pilots who rent aircraft to fly are not precluded from renting a space (as long as they can show a lease agreement giving them custody of the aircraft). | This should be fine as long as the pilot can show custody of the aircraft. However, in the event a lease is up the pilot will have only a limited amount of time to acquire a new aircraft or the hangar will be released. | Language will be added to cover pilots who lease aircraft. | |
| 4/10/2015 | Gen Pub | B | Why require a pilot's license? It's possible an airworthy aircraft owner is not a pilot. | Agreed. Requirement removed. | Requirement Removed. | |
| 4/10/2015 | Gen Pub | B, 2 | Add "all" so that it's clear if ANY of the info is missing, then adios!! | Nice catch. | Language to be changed to include "all." | |

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| 4/10/2015 | Gen Pub | B, 2 | Thirty days seems like a lot--especially if they already own an aircraft. The rules could require an FAA registration within a couple of days, and a certificate of insurance adding the County as an additional insured to be submitted within 30 days. It's usually the proof of insurance that can take a little while. | We feel that thirty days provides ample opportunity for an individual to acquire all the necessary documents in the event they do not have them readily available. If an individual is offered a hangar that already has an aircraft providing the required documentation upon offer of a hangar should not be an issue. | No Change Recommended | |
| 4/10/2015 | Gen Pub | C, 1 | Not sure why the County would want to do this. Many airports move a person to the bottom of the waiting list if they turn down the offer of the hangar or tie-down. What a paperwork nightmare to try and track this. | This is a welcome suggestion. Simpler is better. | Language will be simplified. Individuals will not be removed from the list but simply fall to the bottom of the list. However, failure to take a hangar when offered should still result in the forfeiture of the deposit. | |
| 4/10/2015 | Gen Pub | C, 2 | This, too, seems like a paperwork nightmare for airport staff. How do you track this? What if the 2nd person on the list wants the same privilege as the 1st person and doesn't like the hangar he/she is offered? County might be better off to just re-categorize hangars into similar units, so that there is no need for the person to wait for a different hangar. | Hangars are already categorized into similar units. The reasoning behind allowing for a first right of refusal is for those who are on the waiting list and have not yet acquired, or are unable to acquire at that point in time an aircraft to be stored in the hangar. | Language to be modified to state that individuals refusing the third time will fall to the bottom of the list and forfeit their deposit. | |
| 4/10/2015 | Gen Pub | E | What about a business located on either airport? My assumption when reading this was that the intent was for a maximum of 2 spaces being available to an FBO or commercial operator on the airport, and 2 spaces being available to the owner of the business, for personal purposes (especially given the language in Paragraph N)--but the text doesn't actually say that. In my opinion, any FBO or commercial operator on the airport should be able to store the aircraft used by that FBO or commercial operator in a hangar at the airport (up to whatever limit the County thinks appropriate). | After listening to multiple users, the airport will recommend a change in the language removing the hangar limit completely. As long as the aircraft to be stored in the hangar are identified on the reserve space permit and are in the name of the owner or owners business (provided documentation shows the owners business is in the owners name) then there should be no problem. | Language will be clarified and updated. | |
| 4/10/2015 | Gen Pub | F | This language seems a little ambiguous. I interpreted it to mean that a 2nd individual with a 2nd aircraft wants to have use of the space. If that's the case, I would add language that states both written authorization and proof of insurance have to be submitted prior to the space being available for use by the 2nd aircraft. If what is meant is that the aircraft owner is actually creating a partnership in the ownership of the one aircraft, then I would be more specific about describing that. | The first reasoning is correct. | Language to be clarified and modified to include written authorization and proof of insurance. | |
| 4/10/2015 | Gen Pub | F | I would avoid the use of the phrase "permanent Permittee." If you want to allow subleasing, then I would use the term "Master Permittee," if not, just be consistent with your use of the phrase "primary Permittee." | The use of permanent permittee was being used in reference to individuals in partnerships that have reached the top of a waiting list and have been offered space in a hangar. This was done so that there would be a distinction between someone who has gone through the process to receive space in a hangar and someone that is newly joining a partnership prior to making their way through the waiting list. However, we acknowledge that the use of the phrase permanent permittee can cause confusion. In the case of subletting we agree there should be a designation between the actual permittee and the sublet. In this case the permittee subletting will be designated as the master permittee. | Language throughout the policy will be updated to remove the designation permanent permittee to prevent confusion. Only in the case of a partnership all individuals who have made their way through the hangar waiting list and have been offered a space in a hangar will be designated as primary permittees. Individuals newly joining a partnership that has not gone through the waiting list will be designated as secondary permittees until such time that they reach the top of the hangar waiting list and are offered a permanent position within the hangar the partnership exists. A definitions page will be created alongside the policy to define the terms used within the policy. The distinction permittee will be written to reflect an individual who has legitimately gone through the hangar waiting list, has been offered a position in a hangar, and the individual has accepted the position providing all the necessary documents. Primary permittees will be defined as those in a partnership in a hangar that have gone through the hangar waiting list and have been offered a space in the hangar. Secondary permittees will be defined as individuals newly joining a partnership who are allowed to be in the hangars but have no rights of retention until such time that they become a primary permittee. Language in the subletting portion will be updated to reflect the permittee subletting the space will be known as the master permittee. | |

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| 4/10/2015 | Gen Pub | F | What will the County do if, let's say, 5 partners are added? What will happen as each of the individuals gets to the top of a waiting list---will you have several "primary Permittees?" Then what happens when the first primary Permittee leaves? What happens when the 2nd primary Permittee leaves? Could become quite a mess, especially to track in airport files. | The designation of a primary permittee only occurs in the event of a partnership. The distinction is to define the difference between the primary permittee, an individual in a partnership who has reached the top of the waiting list and has been offered space within the hangar and a secondary permittee, an individual who has joined a partnership but has not yet made their way to the top of the waiting list and formally offered a space in the hangar. Regardless of the designation the same issues will exist when partners leave the partnership. | Language in the policy will designate those individuals who have made their way to the top of the waiting list as primary permittees in a partnership. Those who have not gone through this process will be designated as secondary permittees with no rights of retention. | |
| 4/10/2015 | Gen Pub | F | This use of the word partnership is what made me think that is what the County had in mind. If so, then it's critical that any added individuals also be shown on the FAA aircraft registration, and on the certificate of insurance as a "named insured." It is easy for a policy like this to be abused by people trying to circumvent the waiting list process--so, I understand the requirement for an added individual to have to wait to get to the top of the waiting list, but it seems like a complicated way to go. Why not just say that the original Permittee is the only one that will be on the lease and whenever he/she leaves, everyone must vacate the hangar? | For simple partnerships in aircraft this approach would work. However, in the case of a partnership where the partnership is an LLC this approach may not work. This is why the requirement to have all individuals go through the hangar waiting list to be listed as primary permittees on the reserve space permit is in the policy. While this makes the process complicated for airport staff it ensures fairness to everyone seeking hangar space at the airport. In the case of partnerships outside of an LLC, the requirement that all individuals be placed on the FAA registration is a good one. In the case of LLC's the aircraft only needs to be registered to the LLC but an individual has to be able to show proof of partnership in the LLC. Regardless of the type of partnership, the requirement that all individuals be named on the certificate of insurance as named insured should be the case. | Language in the policy will be updated to reflect that partners in an LLC will be required to show proof of membership in the LLC. An aircraft in an LLC partnership only needs to be registered to the LLC. Partnerships outside of an LC will be required to have all individuals named on the FAA registration. Regardless of type of partnership, all individuals named as permittees (primary or secondary) will be required to be named as insured on the aircrafts certificate of insurance. | |
| 4/10/2015 | Gen Pub | F Blue | Again---I would delete any use of the word, "permanent" in the policies and procedures as it could be misinterpreted to mean "exclusive" and the FAA frowns on that idea. | This is noted. | All references to permanent permittee will be removed. | |
| 4/10/2015 | Gen Pub | F Blue | I like this version because it helps to address the "what if you have 5 people as added individuals" issue. I think the County's best bet is to use a system wherein as soon as the original Permittee is out of the hangar, then it is offered to the 1st name on the waiting list. | This option is a good one. However, it would not be fair to non-original permittees to be kicked out when the original permittee lease provided that those permittees have gone through the waiting list and attained primary status. However this brings up a good point, individuals placing themselves on the waiting list to gain primary status in a partnership should be required to be listed as such on the hangar waiting list. This way once they reach the top of the hangar waiting list they do not necessarily have to wait for a hangar to open up to be offered a place in the hangar/partnership. | Waiting list language should be updated requiring individuals wishing to gain primary status in a partnership to be designated as such on the list. When these particular individuals reach the top of the list they may be offered primary status on the partnership permit without waiting for a hangar to open up. All rules of refusal shall still apply. | |
| 4/10/2015 | Gen Pub | F Yellow | I haven't seen this on any other airport waiting list policies---is this a case of a policy already being in existence and the County feels it has to maintain? Otherwise, I would recommend deleting this entire paragraph and avoiding any system that grants a status to someone other than the primary permittee | This section is no longer in the hangar policy. | No response | |
| 4/10/2015 | Gen Pub | F Blue 2 | If the County feels that it has to allow multiple individuals on a permit, then I would go for the 4 limit. Again, though, I see real political issues down the road when the original Permittee is no longer around and there is a disagreement amongst the remaining partners in the one aircraft (Permittees). | Noted | No Response | What should the limit be? |

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| 4/10/2015 | Gen Pub | F Green 2 | The other issue here is how often the County is likely to see 4 or 5 people as partners in one aircraft (excluding family-owned planes). That's coming really close to having a "flying club" and maybe circumventing other County rules. If this is not intended for 5 partners in one aircraft, then it's even likely, because if 5 people own 5 different aircraft that are trying to use the one hangar/space, they would have incredible calendar issues--which would make me think something else is really going on (like someone trying to circumvent the process). | We will need to research this issue further to ensure circumvention of County rules is not occurring. | Research required | |
| 4/10/2015 | Gen Pub | G, 1 | Why would the County want to do this? What real purpose does it serve? Is this intended for one aircraft with multiple owners? It must be, otherwise why create a policy that could become so problematic (what if one of the individuals buys a plane)? What if several people are dropped from the application form and others added? | This is a good point and raises consistency issues with the beginning of the policy that states permits are only given to individuals. This paragraph should be deleted and every individual, regardless of partnership, should be on the waiting list separately. | Recommend removal of paragraph | |
| 4/10/2015 | Gen Pub | G, 2 | This paragraph reads as though the "multiple applicants" are a "group." If they're partners in one plane, why treat them that way? If they own multiple aircraft, what a mess--just have each have their own application. Ha, ha--what if they can't agree on whether or not to take the space? | See above | Recommend removal of paragraph | |
| 4/10/2015 | Gen Pub | G, 2 | If there's an unmentioned goal here, I'd spell it out. I've only seen flying clubs handled this way. Wouldn't the multiple applicants be better off to submit individual applications, then as each comes to the top of the list, each can be a Permittee? What does it benefit each individual to be part of the group? | See Above | Recommend removal of paragraph | |
| 4/10/2015 | Gen Pub | H | Shouldn't they get a refund of their deposit? | If an applicant ends up being merged into a different list then their deposit remains on file. If an applicant is removed entirely due to the deletion of a list then the deposit should be refunded. | Language in the policy should be updated to reflect the deposit for the hangar waiting list is to be refunded in the event of a list deletion. | |
| 4/10/2015 | Gen Pub | M | County might want to supply it's own County Counsel-approved sublease for use by the Permittee. | It is the intention of the Airport to provide for a County approved sublease and temporary sublease. | The hangar policy should be updated to reflect that subleases should be done under a county created and approved sublease for sublets in the corporate box hangars. And temporary sublets in all other hangars. | |
| 4/10/2015 | Gen Pub | M, 2 | This seems to be a 2nd plane owned by the Permittee. If so, I would move the paragraph out of the "subletting" section. Permittees wouldn't be subletting to themselves. What happens if the primary aircraft is sold, but they still own the secondary aircraft? Add proof of insurance clause. | This paragraph does not belong in the subletting section. There actually should not be a requirement for permittees to have to submit this type of form. As long as a permittee shows proof of ownership and insurance they may be allowed to list the aircraft as storable in their hangar. Most hangars only have enough space for one aircraft anyway so this shouldn't be an issue. For the corporate box hangar, as long as there is room, the permittee should be able to store any aircraft they own. | Recommend removal of paragraph | |
| 4/10/2015 | Gen Pub | M, 2 | I'd spell out that this only applies to certain hangars; a t-hangar can't hold 2 aircraft at the same time. | Temporary sublets are allowed in all hangars. This is to give people flexibility to allow others to use their hangars while they are not using the hangar themselves (out of town). Non-temporary sublets are only allowed in the corporate box hangars. Rules for assessing sublet rates will apply to all forms of sublets. | Language in this section will be updated ad clarified. | |

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| 4/10/2015 | Gen Pub | M, 3 | Requiring the named insured is a helpful way for the County to try and minimize the circumventing of the policies (use of the space by those who haven't worked their way to the top of the waiting list in the normal way). If it's not to be required, then I'd suggest adding a penalty in the event that the County inadvertently discovers an instance of a 90+ day sublet, to try and dissuade the practice--like immediate forfeiture of the space by the Permittee. | Since all sublets will require a county provided sublease, insurance documentation for the subleasee must be provided to the airport and be kept on file. A penalty to discourage misuse or circumvention of the policy is a good idea. | Sections in the policy should reflect what constitutes violation of the policy and the penalty. Recommendation pending AAC guidance. | What should the penalty be for violation of the policy? |
| 4/10/2015 | Gen Pub | M, 3 | And the County as additional insured. | The county should be named as additionally insured for every aircraft stored in a hangar at both airports. | Insurance language will be checked to ensure all aircraft stored at both airports will name the county as additionally insured. | |
| 4/10/2015 | Gen Pub | N | So---this is in addition to the space limitations identified in Section I.E? If so, ought to reference Section E. FBOs and commercial operators at the airport should be able to store aircraft used for their business purposes in hangars at the airport (it represents a large investment/asset for the business). This language seems to limit the FBOs and concessionaires to storing only personal aircraft. See also comments on Paragraph III.A. | Agreed. The section should not place undue burden on any individual just because they are an FBO or Business. | Sections shall appropriately reference other sections as required. Paragraph N 2 should be deleted. | |
| 4/10/2015 | Gen Pub | N | This could be tough to enforce--some FBOs, commercial operators, and concessionaires have their personal aircraft owned by the business, and have the business pay the debt service on the aircraft. What if use of such an aircraft is incidental to the business--meaning that it's occasionally used for business purposes, wouldn't that be acceptable? | See Above | Recommend removal of paragraph N 2 | |
| 4/10/2015 | Gen Pub | O | Emails or faxes accepted? | Emails could be used but the airport would prefer a hardcopy written notice with a wet signature. | Recommendation pending AAC guidance. | Should emails be accepted as well? |
| 4/10/2015 | Gen Pub | O | Add language to make Permittee responsible for all clean up costs, in the event the space is not left clean. | This is typical of most leases. | Recommend language addition making tenant responsible for returning premises to original condition minus normal wear and tear. | |
| 4/10/2015 | Gen Pub | II, A, 1, a Blue | I recommend that the County use this version. It's much easier to enforce. I would recommend this for all waiting lists---as written, however, this would be treating the corporate hangars differently than the other hangars, which allow going to the bottom of the waiting list. | No response | Recommendation pending AAC guidance. | Which option should be chosen? |
| 4/10/2015 | Gen Pub | II A, 1, a Green | If the County wants to use this mechanism, then I would suggest that it be limited to only those instances in which there is no one on the waiting list for the corporate hangars. | No response | Recommendation pending AAC guidance. | Which option should be chosen? |
| 4/10/2015 | Gen Pub | II, A, 1, b | Does 82 mean 1982? If so, I'd change the text to read 1982. Also, I'd refer to the hangars as Hangar 42, etc. | The hangars are typically referred to and title were built. Hangar areas should be titled differently to prevent confusion. Hangar titles could be renamed based on their location on the airport? | More appropriate hangar area titles will be looked in to. | |
| 4/10/2015 | Gen Pub | II, A, 1, b blue | I would recommend using this version. The main goal is to provide the service of hangar aircraft storage, whether publicly or privately owned. Many airports would treat this as just a refusal, and allow the applicant to go to the bottom of the waiting list. But I have seen instances where everyone on the waiting list refused the space, then what does the County do? I think everyone who applies to be on a waiting list is a lot more serious about it if a deposit is charged---and if you are removed from the list and forfeit the deposit in the event they refuse an offer of space. | Currently a change is being considered requiring only the top 10 individuals on the hangar waiting list to provide a deposit. Final refusal would result in dropping the individual to the bottom of the list and forfeiture of the deposit. A new deposit would have to be furnished should the same individual reach the top 10 position on the list again. | Recommendation pending AAC guidance. | What deposit structure should the airport use? Should everyone or a select few be required to pay a deposit? |
| 4/10/2015 | Gen Pub | II, A, 1, c blue | I would recommend this version be used by the County; less prone to snags, and encourages use of the waiting lists by those who are serious about being on the list. | No response | Recommendation pending AAC guidance. | Which option should be chosen? |
| 4/10/2015 | Gen Pub | II, C, grey | I like the idea of a uniform deposit being required, and that it be paid for each particular list an applicant chooses to be on. Amount seems a little steep, especially in the event a tie-down list is ever created. | A separate tie down deposit could be assessed. The airport welcomes the day a tie down waiting list is required. | Recommendation pending AAC guidance. | Should a smaller deposit be assessed for tie-down deposit? Or should this be addressed and the policy updated when it is required? |

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| 4/10/2015 | Gen Pub | III, A | In conjunction with my comments on Paragraph I.E and III.A, if this text is specifically to relate to FBOs or concessionaires, whose aircraft may very well be in the name of the firm, then the text needs to say so. | This is addressed in other comment sections. | No Response | |
| 4/10/2015 | Gen Pub | IV, A, 1 | Just wondering if the County is hiring additional staff to manage the changes in requirements--this documentation for airworthiness, and the preceding ideas of monitoring waiting lists to see how additional individuals are doing on their way to becoming Permittees, could easily result in additional workload for clerical staff. | The airport recognizes that this will create additional workload upfront until all forms and lists are updated and reconfigured. However, given the rate hangars come up at the airport the long term workload is anticipated to be low. | No Response | |
| 4/10/2015 | Gen Pub | IV, A, 2 | This and the preceding paragraph could relate to both experimental and certified aircraft, but this paragraph may need to be changed to indicate that it is meant to include experimental and LSA aircraft. | To be reviewed | No recommendation at this time. | |
| 4/10/2015 | Gen Pub | IV, B, 1 | I concur with the County's idea of prioritizing use of hangar and tie-down space for aircraft that fly. | No response required | No Response | |
| 4/10/2015 | Gen Pub | IV, B 2 | Might want to re-do the intro on waiting lists, to specifically instruct applicants on what's expected of them in the event they are building an aircraft. | This is a good point and will be addressed. | Introduction to be clarified. | |
| 4/10/2015 | Gen Pub | IV, B, 2 | Is this intended to allow the building of aircraft in a County hangar---or at one of the FBOs, with just storage of parts in the County hangar? If intent is to allow actual construction in a County hangar, I would recommend that language be added to state that it's allowable to the extent permitted by the building and fire codes--or identify an exhaustive list of what is approved. It is likely the County hangars were designed to meet code compliance for storage of aircraft, not construction. | This is a good point and has been addressed with previous comments. No construction of aircraft requiring open flame or hazardous materials will be allowed in a non-improved hangar allowing for this type of work. | Language concerning construction of aircraft to be clarified to include what hangar requirements are to facilitate construction of an aircraft in a hangar. | |
| 4/10/2015 | Gen Pub | IV, C, 2 | And that it's not the result of contacting the FBO, the day before the annual expires, to conduct the annual inspection for the aircraft :-) | Good faith efforts to retain the airworthiness certificate need to be furnished to qualify for any extension as the policy allows. | No Response | |
| 4/10/2015 | Gen Pub | IV, C, 2 | Is this intended for those with aircraft damaged in an incident/accident, or suffering a new AD? | This is intended for aircraft that are damaged, not airworthy to begin with, or become non airworthy for any reason. | No recommendation at this time. | |
| 4/10/2015 | Gen Pub | IV, D | I understand that part of the County's overall intent with these policies is to keep the waiting lists realistic, and not filled with many names of those who do not own aircraft. And I understand the prioritization of available hangar space for airworthy aircraft. I think part of the idea, however, is also to lower the liability risk of the County by ensuring that aircraft based at the airports are adequately maintained. Suspension of the airworthiness documentation requirements, for any period of time, but especially the open-ended suspension of until 10 applicants are on the waiting list seems to be counter-productive to at least two of the County's goals. | This will be reviewed and researched. Certain elements of the policy are formulated with the notion that there will be an active hangar waiting list. However, suspension of other elements may not make sense in the event that a hangar waiting list becomes inactive. We will review the policy and update it as necessary with this pointing mind. | No recommendation at this time. | |
| 4/10/2015 | Gen Pub | V, D | Just a thought: if the County hasn't run these proposed policies and procedures past an insurance agent/broker/underwriter, I'd find one to review the text. Just to make sure that everything the County is requiring is available in the marketplace for pilots. | This is a good point. The policy will be run by an insurance broker to ensure what is being asked is available and not cost prohibitive. | No recommendation at this time. | |
| 4/10/2015 | Gen Pub | VI, 2 | I have always wondered if this creates an inequity amongst airport tenants, since an aircraft owner of an experimental aircraft is allowed to do more work on that plane, than an owner of a certified aircraft. Also, if the tenant in the hangar next to mine is an A&P, he/she are allowed to do much more maintenance on the aircraft than I am. What might be more informative to a tenant is a list of what kinds of activities are allowed, and which are not. | The point is well taken. A general list of what is allowed and not allowed can be created. | No recommendation at this time. | |